Catholic Charities Disabilities Services	
Agency Standard and Procedure	
Standard Category	Administrative
Standard Title	Record Retention and Destruction
Regulations	Multiple Federal and New York State Laws and Regulations
Original Issue Date	12/18/2013
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Approved by: Paula Warika, Executive Director	Paula Warika

Standard:
The purpose of this Standard is to ensure that necessary records and documents are adequately protected and maintained and that records that are no longer needed by Catholic Charities Disabilities Services or Catholic Charities of the Diocese of Albany are discarded at the proper time and in a confidential way.

If a specific contract is more stringent than this standard, the contract supersedes the standard and the agency will follow the retention schedule outlined in the contract.

Records are the property of Catholic Charities of the Diocese of Albany and its agencies, not the property of individual employees, and may not be removed without proper authority.

In the event Catholic Charities of the Diocese of Albany or any of its agencies is served with any subpoena or request for documents or any employee becomes aware of a governmental investigation or audit concerning Catholic Charities or the commencement of any litigation against or concerning Catholic Charities such employee shall inform the Executive Director and any further disposal of documents shall be suspended until the time when the Executive Director, with the advice of counsel, determines otherwise. The Executive Director shall take such steps as is necessary to promptly inform all staff of any suspension in the further disposal of documents.

Procedure

1. **Record Retention Schedule**
   The Record Retention Schedule applies to all paper or "hard copy" records. Procedures for the retention of electronic records can be found in the "Electronic Data Management" Standard.

   The Record Retention Schedule is organized as follows:
   a) Governance Records
   b) Legal Files and Papers
   c) Client Case Records
   d) Contracts and Grants
   e) Personnel Records
   f) Training Records

g) Accounting and Finance
h) Payroll Documents
i) Pension Documents
j) Property Records
k) Correspondence and Internal Memoranda

A. **Governance Records**

Record Type	Retention Period
Minutes of the Board of Trustees and all committees, BOT resolutions	Permanent
Corporate Seal	Permanent
Articles of incorporation	Permanent
Corporate by-laws	Permanent
IRS determination letters	Permanent
Minutes of Agency Board of Directors and all committees, Board resolutions	Permanent
Agency By-laws	Permanent
Operating Licenses or Certificates	Permanent

B. **Legal Files and Papers**

Record Type	Retention Period
Legal Memoranda and Opinions (including all subject matter files)	7 years after matter is closed unless related to litigation
Litigation related materials	As determined in consultation with legal counsel
Court Orders	As determined in consultation with legal counsel

C. **Quality Assurance Records**

Record Type	Retention Period
Incident Management	10 years after investigation is closed
Human Rights	Permanent
Internal Audit Records	10 years
External Audit Records	10 years
External Audit Plan of Corrective Actions (POCAs)	10 years
Annual Satisfaction Survey	10 years

D. **Individual Case Records/Documentation of Service Delivery**

Type	Record	Retention Period
Residential Management	House IPOP	10 years
	Staffing Schedule	10 years
	Fire Drill Records	10 years
	Other Miscellaneous Administrative Records	3 years

ICF, HBCS Waiver Programs, Respite	Eligibility and Enrollment	Permanent
	Legal Notifications (e.g., Rights Statements, Liability Statements, Privacy Practices	10 years after termination of services
	Guardianship	10 years after termination of services
	Clinical Assessments	10 years
	ISP / Life Plan	10 years
	Hab Plan / Staff Action Plan	10 years
	Monthly Summary	10 years
	Daily Service Provision	10 years
	Billing Sheets	10 years
Medical Records	Dining Plans	Permanent
	Medical Consultations	Permanent
	Nursing Notes/Assessments	Permanent
	Medical Screenings	Permanent
	Hospital Discharge Summaries	Permanent
	Annual Nursing Assessments	Permanent
	Plan of Nursing Services	Permanent
	Medical Administration Records (MARs)	Permanent
	Behavioral Data/Plans	Permanent
	Assessments, Evaluations & Protocols	Permanent
	DNR/MOLST Documentation	Permanent

E. Department Documentation

All meeting minutes will include the sign-in sheets.

Record Type	Retention Period
Residential Services Department Meeting Minutes	7 years
Supportive Health Services Department Meeting Minutes	7 years
Agency Staff Meeting Minutes	7 years

F. Contracts and Grants

If a specific contract is more stringent than this Standard, the contract supersedes the Standard and the agency will follow the retention schedule outlined in the contract.

If several agencies apply together for a contract or grant, the lead agency is responsible for record retention.

Record Type	Retention Period
Contracts and Related Correspondence (including any letters of intent, pre-applications, agreements, all other supportive documentation)	10 years after completion of grant or contract period
Fiscal reports including invoicing and any supporting documentation	10 years after completion of grant or contract period
Program reports	10 years after completion of grant or contract period

G. Personnel Records

Record Type	Retention Period
Pre-Employment Records - All Non-Hired Applicants (including all applications and resumes - whether solicited or unsolicited; results of post-offer, pre-employment physicals; results of background investigations and reference checks, if any; related correspondence, job advertisements, job announcements, internal job postings)	1 year
Employee Personnel Records	10 years after separation
Intern/Volunteer Records	10 years after separation
Employee Medical Records	10 years after separation
Employee Medical Records for employees exposed to blood or other potentially infectious materials	30 years after separation
Employee Handbooks	1 copy kept permanently at CCDA EOSS
Forms I-9	3 years after date of hire or 1 year after termination whichever is longer

H. Training Records

Record Type	Retention Period
Training Class Sign-in Sheets (also kept electronically)	10 years
Official Certifications resulting from agency training, e.g. Med Cert, SCIP, CPR etc. (also kept electronically)	Stored in personnel file. 10 years after separation.
Requirements of Professional Development for the purposes of service delivery, including all OPWDD mandated/required trainings (also kept electronically).	Stored in personnel file. 10 years after separation.
Professional Qualification Certifications	Stored in personnel file. 10 years after separation.

I. Accounting and Finance

Record Type	Retention Period
Accounts Payable ledgers and schedules	10 years
Accounts Receivable ledgers and schedules	10 years
Annual Audit Reports and Financial Statements	Permanent
Annual Audit Records, including work papers and other documents that relate to the audit	10 years after completion of audit
Annual Plans and Budgets	10 years
Bank Statements and Canceled Checks	10 years
Employee Expense Reports	10 years
General Ledgers	Permanent

Investment Records	10 years after sale of investment
Contribution and donation records	10 years
Sales/Use Tax Records	10 years
Annual Information Returns – Federal and State	Permanent
IRS or other Government Audit Records	Permanent

J. **Payroll documents**

All information in this section are stored electronically.

Record Type	**Retention Period**
Employee Deduction Authorizations	7 years after termination
Payroll Deductions	7 years after termination
W-2 and W-4 Forms	7 years after termination
Garnishments, Assignments, Attachments	7 years after termination
Time Studies	10 years
Payroll Registers (gross and net)	7 years
Time Cards/Sheets	Permanent
Payroll Tax Records	7 years

K. **Pension documents and supporting employee data**

Record Type	**Retention Period**
Retirement and Pension Records	Permanently stored electronically at CCDA EOSS

L. Property Records

Property records will be retained by the owner of the property. In cases where Catholic Charities of the Diocese is the owner of property, property records will be maintained by the Central Office. Each agency is responsible for retaining lease agreements.

Record Type	**Retention Period**
Correspondence, Property Deeds, Assessments, Licenses, Rights of Way, Original Purchase/Sale	Permanent
Lease Agreement	10 years after expiration of the term

M. Correspondence and internal memoranda

Correspondence and internal memoranda will be retained for the same period as the document they pertain to or support. For instance, a letter pertaining to a particular contract would be retained as long as the contract (10 years after expiration).

2. **Record Storage**
    a) When applicable, hard copy or paper records will be kept at the main office, the main office storage room, at a program site, or at a secure off-site facility, such as 3N or as chosen by the Executive Director.
    b) On at least an annual basis, hard copy of paper records will be reviewed and those records which can be destroyed will be identified and destroyed in a manner consistent with law and regulation.
    c) On at least an annual basis, electronic records will be reviewed and those records which can be destroyed will be identified and destroyed in a manner consistent with law and regulation.
    d) When documents are transferred to storage boxes, the boxes will be labeled in accordance with the requirements of 3N or other storage company.
    e) The Executive Administrative Assistant or designee is responsible for maintaining a log that tracks record storage and records document destruction.